

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

AT

**FirstCo, Inc.**  
455 S Blue Grass Rd.  
Walcott, IA 52773  
(563) 284-5110

EPA RCRA ID: None

ON

July 29, 2009

BY

Booz Allen Hamilton

FOR

U.S. ENVIRONMENTAL PROTECTION AGENCY  
Region 7  
Environmental Services Division

**INTRODUCTION**

At the request of the Environmental Services Division (ENSV) and the Environmental Field Compliance Branch (EFCB) of the U.S. Environmental Protection Agency (EPA) Region 7, Booz Allen Hamilton (Booz Allen) conducted a Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI) on July 29, 2009, at FirstCo, Inc. (FirstCo) located in Walcott, Iowa. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. Booz Allen gathered information and data necessary for EPA to determine compliance with applicable regulatory and statutory requirements. During the CEI, it was discovered that FirstCo currently generates less than 0.5 kilograms (1 pound) hazardous waste per calendar year at the facility. At this rate, FirstCo is currently operating as a conditionally-exempt small quantity generator (CESQG) of hazardous waste [generating less than 100 kilograms (200 pounds) of hazardous waste per calendar month]. FirstCo is also operating as a generator of used oil. The CEI was conducted as a Level B Multimedia Inspection, and the *Region 7 Multimedia Screening Checklist* is included as Attachment 1.